

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED

MAR 10 11 06 AM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS FROM
UNITED PARCEL SERVICE TO UNITED STATES
POSTAL SERVICE WITNESS KINGSLEY
(UPS/USPS-T10-15 through 21)
(March 10, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Kingsley: UPS/USPS-T10-15 through 21.

Respectfully submitted,



John E. McKeever
William J. Pinamont
Phillip E. Wilson, Jr.
Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP
3400 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2762
(215) 656-3310
(215) 656-3301 (FAX)

and

1200 Nineteenth Street, NW
Washington, DC 20036-2430
(202) 861-3900

Of Counsel.

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS KINGSLEY

UPS/USPS-T10-15. Refer to page 3 of the document attached to the response to UPS/USPS-T10-5. Describe in detail all sampling activities undertaken with respect to each of these categories:

- (a) Airborne@Home DDU shipments.
- (b) Plant-verified DDU shipments.
- (c) All other DDU shipments.

Include in your answer all available information related to how often shipments are sampled, what portion of each shipment is sampled, and the type of information gathered in the sampling process.

UPS/USPS-T10-16. What specific cost segment includes the costs involved in sampling DDU shipments?

UPS/USPS-T10-17. Provide all available information related to the volume of plant-verified destination entry Parcel Post in comparison to non-plant verified destination entry Parcel Post in the Base Year.

UPS/USPS-T10-18. Provide all available information related to the volume of plant-verified destination entry Parcel Post in comparison to non-plant verified destination entry Parcel Post in FY1999.

UPS/USPS-T10-19. Provide all available information related to the volume of plant-verified destination entry Parcel Post in comparison to non-plant verified destination entry Parcel Post in:

- (a) the Test Year Before Rates and

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS KINGSLEY

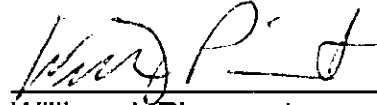
(b) the Test Year After Rates.

UPS/USPS-T10-20. Provide all available information with respect to the average time that Parcel Post pieces take to be delivered subsequent to their entry or arrival at the DDU.

UPS/USPS-T10-21. Provide all available information with respect to how often Parcel Post pieces are delivered by the next business day after entry or arrival at the DDU.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

A handwritten signature in black ink, appearing to read 'William J. Pinamont', is written over a horizontal line.

William J. Pinamont
Attorney for United Parcel Service

Dated: March 10, 2000
Philadelphia, Pa.